Wright, Constable & Skeen, L.L.P. Attorneys at Law

One Charles Center, 16th Floor • 100 N. Charles Street • Baltimore, Maryland 21201-3812 • 410-659-1300 • Fax 410-659-1350

August 21, 2003

Writer's Direct Dial/E-mail: (410)659-1312 mfried@wcslaw.com

Douglas G. Worrall Michael J. Abromaitis Monte Fried James W. Constable David W. Skeen Robert W. Hesselbacher, Jr.** James D. Skeen* Kenneth F. Davies Stephen F. White Lois Fenner McBride Frederick L. Kobb Paul F. Evelius Mary Alice Smolarek*

Associates

Michael A. Stanley Howard S. Stevens* Victoria August Joy K. Sakellaris

Of Counsel

Francis N. Iglehart P. McEvoy Cromwell

Wm. P. Constable (1882-1976) John D. Wright (1903-1976)

Towson Office

307 West Allegheny Avenue Towson, Maryland 21204-4258 Phone 410-825-0750 410-825-0715

www.wcslaw.com

Honorable William M. Nickerson, Sr. United States District Court for the District of Maryland Garmatz Federal Courthouse 101 W. Lombard Street Baltimore, MD 21201

Beth O. Scott v. Life Insurance Company of Re: North America Case No.: WMN 03 CV 524 United States District Court for the District of Maryland

Dear Judge Nickerson:

The above-referenced case has been brought under ERISA, and the Plaintiff seeks, among other things, a reversal of the Defendant's decision to terminate long term disability benefits.

Under the existing Scheduling Order, Motions for Summary Judgment are due on September 26, 2003. To allow the parties an opportunity to explore whether this matter can be resolved without further litigation, counsel for the Plaintiff and the Defendant jointly and respectfully request that the Scheduling Order be revised so that the deadline for filing Motions is extended until October 27,

^{*}Admitted in the District of Columbia and Maryland

^{*}Admitted in the District of Columbia, Maryland and Virginia

2003. Favorable consideration of this request will be greatly appreciated.

Respectfully,

/s/

Monte Fried Attorney for Defendant, Life Insurance Company of North America

acg/

cc: Carrie J. Feit, Esq. (via e-filing) Howard J. Bernstein, Esq. (via e-filing)